

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JENNIFER D. ARAOZ, :
Plaintiff, : No. 1:22-cv-00125 (AMD) (RML)
vs. :
THE NEW ALBANY COMPANY LLC, et al., :
Defendants. :

ANSWER

Defendants The New Albany Company, LLC, The YLK Charitable Fund, The Wexner Family Charitable Fund, Leslie H. Wexner, Abigail S. Wexner, as former President & Director of The YLK Charitable Fund, and The Wexner Foundation (collectively “Defendants”), by way of Answer to the Summons with Notice hereby deny each and every allegation set forth by Plaintiff in her Summons with Notice.

FIRST DEFENSE

The Summons with Notice fails to state a claim upon which relief may be granted.

SECOND DEFENSE

The Summons with Notice fails for lack of personal jurisdiction.

THIRD DEFENSE

The Summons with Notice fails and/or should be transferred as the case is filed in the improper venue.

FOURTH DEFENSE

The Summons with Notice is barred in whole or in part by the statute of limitations.

FIFTH DEFENSE

The Summons with Notice is barred by insufficiency of service of process.

SIXTH DEFENSE

The Summons with Notice is barred by laches.

SEVENTH DEFENSE

The Summons with Notice is barred by Plaintiff's unclean hands.

EIGHTH DEFENSE

The Summons with Notice is in violation of Rule 11.

WHEREFORE, Defendants The New Albany Company, LLC, The YLK Charitable Fund, The Wexner Family Charitable Fund, Leslie H. Wexner, Abigail S. Wexner, as former President & Director of The YLK Charitable Fund, and The Wexner Foundation demand judgment in their favor and against Plaintiff, dismissing Plaintiff's claims with prejudice, and awarding Defendants their attorneys' fees and costs, and such other and further relief as the Court deems equitable and just.

Dated: January 14, 2022.

New York, New York

Respectfully submitted,

PETRILLO KLEIN & BOXER LLP

By: /s/ Guy Petrillo
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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system this fourteenth day of January 2022, and served via U.S. Mail upon the following:

Jennifer D. Araoz
78-16 81st Street
Glendale, NY 11385

Plaintiff / Pro Se

By: /s/ Guy Petrillo
Guy Petrillo